

ORDER SUMMARY
Consumer Services Division Case Number C-23-3637

Consent Orders resolve investigations. In these, companies and individuals work with us to agree to terms that resolve the alleged issues in the investigation.

Name(s)	DOLAN GADDI LENDING, INC., NMLS # 918742 CHRISTOPHER E. DOLAN, NMLS # 270548 PETER C. GADDI, NMLS # 785377
Order Number	C-23-3637-25-CO01
Date issued	02/10/25

What does this Consent Order require?

- Cease and desist from violating the Act and rules as alleged.
- Dolan Gaddi Lending's CL license revocation. *This has been stayed until February 10, 2030, and will not go into effect unless Respondent does not comply with the Consent Order.*
- Christopher Dolan's MLO license revocation. *This has been stayed until February 10, 2030, and will not go into effect unless Respondent does not comply with the Consent Order.*
- Stays may be lifted for future violations within five years.
- Must pay a fine of \$39,968.00. *\$25,000 of this fine is stayed until February 10, 2030 and does not have to be paid as long as Respondents comply with the order.*
- Must pay an investigation fee of \$5,000.00. (Investigation fees cover the cost of DFI staff time working on the investigation.)
- Payment plan for \$19,968.00 over forty-eight months.
- Must pay restitution of \$129.00 to one member of the public.

Need more information?

You can contact the Consumer Services Division, Enforcement unit at (360) 902-8703 or cseforcecomplaints@dfi.wa.gov. *Please remember that we cannot provide financial or legal advice to members of the public. We also cannot release confidential information.*

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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES**

IN THE MATTER OF DETERMINING:
Whether there has been a violation of the
Consumer Loan Act of Washington by:

No.: C-23-3637-25-CO01

CONSENT ORDER

DOLAN GADDI LENDING, INC.,
NMLS #918742,

CHRISTOPHER E. DOLAN, Owner,
NMLS #270548, and

PETER C. GADDI, Owner,
NMLS #785377,

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Ali Higgs, Division of Consumer Services Director, and Dolan Gaddi Lending, Inc. (Respondent DGL), Christopher E. Dolan, Owner of Respondent DGL (Respondent Dolan), and Peter C. Gaddi, Owner of Respondent DGL (Respondent Gaddi) (collectively, Respondents), and finding that the issues raised in the above-captioned matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is entered pursuant to chapter 31.04 of the Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the following:

AGREEMENT AND ORDER

The Department of Financial Institutions, Division of Consumer Services (Department) and Respondents have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-23-3637-24-SC01 (Statement of Charges), entered September 18, 2024 (copy attached hereto). Pursuant to chapter 31.04 RCW, the Consumer Loan (Act), and RCW 34.05.060 of the Administrative Procedure Act, Respondents hereby agree to the Department's entry of this Consent

1 Order and further agree that the issues raised in the above-captioned matter may be economically and
2 efficiently settled by entry of this Consent Order. The parties intend this Consent Order to fully
3 resolve the Statement of Charges.

4 Based upon the foregoing:

5 **A. Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter
6 of the activities discussed herein.

7 **B. Waiver of Hearing.** It is AGREED that Respondents have been informed of the right to a
8 hearing before an administrative law judge, and hereby waive their right to a hearing and any and all
9 administrative and judicial review of the issues raised in this matter, or of the resolution reached
10 herein. Accordingly, Respondents, by their signatures below, withdraw their appeal to the Office of
11 Administrative Hearings.

12 **C. Cease and Desist.** It is AGREED that Respondents shall cease and desist from violating
13 the Act and related rules as alleged in the Statement of Charges.

14 **D. Consumer Loan License Revocation (Stayed).** It is AGREED that Respondent DGL's
15 consumer loan license is revoked, except that the revocation is stayed and only effective if the stay is
16 removed pursuant to Paragraph K. It is further AGREED that Respondent DGL's consumer loan
17 license revocation is stayed for five years from the date of entry of this Consent Order contingent
18 upon Respondent DGL's compliance with the Act and related rules, and compliance with this
19 Consent Order. If Respondent DGL does not comply with the Act, related rules, or this Consent
20 Order within that period, the stay may be lifted pursuant to Paragraph K. Absent any action by the
21 Department to lift the stay and impose the stayed revocation pursuant to Paragraph K, the revocation
22 shall expire five years from the date of entry of this Consent Order without further action or notice by
23 the Department, however expiration shall not occur if the steps of lifting the stay as stated in
24 Paragraph K are in process by the Department.

1 **E. Loan Originator License Revocation (Stayed).** It is AGREED that Respondent Dolan's
2 mortgage loan originator license is revoked, except that the revocation is stayed and only effective if
3 the stay is removed pursuant to Paragraph K. It is further AGREED that Respondent Dolan's
4 mortgage loan originator license revocation is stayed for five years from the date of entry of this
5 Consent Order contingent upon Respondent Dolan's compliance with the Act and related rules, and
6 compliance with this Consent Order. If Respondent Dolan does not comply with the Act, related
7 rules, or this Consent Order within that period, the stay may be lifted pursuant to Paragraph K.
8 Absent any action by the Department to lift the stay and impose the stayed revocation pursuant to
9 Paragraph K, the revocation shall expire five years from the date of entry of this Consent Order
10 without further action or notice by the Department, however expiration shall not occur if the steps of
11 lifting the stay as stated in Paragraph K are in process by the Department.

12 **F. Fine (Partially Stayed).** It is AGREED that Respondents shall pay a fine to the
13 Department in the amount of \$39,968, except that payment of \$25,000 of the fine is stayed and only
14 effective if the stay is removed pursuant to Paragraph K. It is further AGREED that payment of
15 \$25,000 of the fine is stayed for five years from the date of entry of this Consent Order contingent
16 upon Respondents' compliance with the Act and related rules, and compliance with this Consent
17 Order. If Respondents do not comply with the Act, related rules, or this Consent Order within that
18 period, the stay may be lifted pursuant to Paragraph K. Absent any action by the Department to lift
19 the stay and impose the stayed revocation pursuant to Paragraph K, the revocation shall expire five
20 years from the date of entry of this Consent Order without further action or notice by the Department,
21 however expiration shall not occur if the steps of lifting the stay as stated in Paragraph K are in
22 process by the Department.

23 **G. Restitution.** It is AGREED that Respondents shall pay restitution to the consumer
24 identified in Paragraph 1.17 of the Statement of Charges in the amount of \$129.

1 **H. Investigation Fee.** It is AGREED that Respondents shall pay an investigation fee to the
2 Department in the amount of \$5,000.

3 **I. Payment Plan.** The unstayed portion of the Fine and Investigation Fee, an amount
4 totaling \$19,968, shall be paid to the Department together in 48 equal monthly installments of \$416
5 by the first day of each month beginning on March 1, 2025, in the form of a cashier' check made
6 payable to the "Washington State Treasurer."

7 **J. Acceleration Clause.** At the option of the Department, if any payment due pursuant to
8 Paragraph I is more than 15 days past due, the entire remaining balance shall become due and
9 payable immediately without notice to Respondents. The Department may pursue all available legal
10 remedies, including entry of a Confession of Judgment consistent with chapter 4.60 RCW.

11 **K. Lifting of Stay and Imposition of Stayed Sanctions.** It is AGREED:

- 12 1. If during the stay, the Department determines that Respondents have not complied
13 with the Act, related rules, or this Consent Order, and the Department seeks to lift the
14 stay and impose the Stayed Revocations and Fine, the Department will first serve
15 Respondents with a written notice of alleged noncompliance.
- 16 2. The notice will include:
 - 17 i. A description of the alleged noncompliance;
 - 18 ii. A statement that the Department seeks to lift the stay and impose the Stayed
19 Revocations and Fine;
 - 20 iii. Notice that Respondents can contest to the Department's determinations of
21 noncompliance in an adjudicative hearing before an Administrative Law
22 Judge (ALJ) of the Office of Administrative Hearings; and
 - 23 iv. Notice that the notification and adjudicative hearing process provided in this
24 paragraph applies only to this Consent Order in the event Respondents choose
 to contest the Department's determination of noncompliance.
3. If Respondents wish to contest the Department's determination of noncompliance,
 Respondents will have 20 days from the date of receipt of the Department's notice to
 submit a written request to the Department for an adjudicative hearing.
4. The scope and issues of the adjudicative hearing are limited solely to whether or not
 Respondents are in violation of the terms of this Consent Order, the Act, or related
 rules.

1 5. At the conclusion of the hearing, the ALJ will issue an initial decision. Any party may
2 file a petition for Review of the initial decision with the Director of the Department.

3 6. DEFAULT: If Respondents do not timely request an adjudicative hearing, the
4 Department will impose the Stayed Revocations and Fine without further notice.

5 **L. Rights of Non-Parties.** It is AGREED that the Department does not represent or have the
6 consent of any person or entity not a party to this Consent Order to take any action concerning their
7 personal legal rights. It is further AGREED that for any person or entity not a party to this Consent
8 Order, this Consent Order does not limit or create any private rights or remedies against Respondents,
9 limit or create liability of Respondents, or limit or create defenses of Respondents to any claims.

10 **M. Change of Address.** It is AGREED that for the duration of the period this Consent Order
11 is in effect, unless otherwise agreed to in writing by the Department, Respondent DGL shall provide
12 the Department with a mailing address and telephone number at which Respondent DGL can be
13 contacted and Respondent DGL shall notify the Department in writing of any changes to its mailing
14 address or telephone number within fifteen days of any such change.

15 **N. Records Retention.** It is AGREED that Respondent DGL, its officers, employees, and
16 agents shall maintain records in compliance with the Act and provide the Director with the location
17 of the books, records and other information relating to Respondent DGL's consumer loan company
18 business, and the name, address, email, and telephone number of the individual responsible for
19 maintenance of such records in compliance with the Act.

20 **O. Authority to Execute Order.** It is AGREED that the undersigned have represented and
21 warranted that they have the full power and right to execute this Consent Order on behalf of the
22 parties represented.

23 **P. Non-Compliance with Order.** It is AGREED that Respondents understand that failure to
24 abide by the terms and conditions of this Consent Order may result in further legal action by the

1 Director. In the event of such legal action, Respondents may be responsible to reimburse the Director
2 for the cost incurred in pursuing such action, including but not limited to, attorney fees.

3 **Q. Voluntarily Entered.** It is AGREED that Respondents have voluntarily entered into this
4 Consent Order, which is effective when signed by the Director's designee.

5 **R. Completely Read, Understood, and Agreed.** It is AGREED that Respondents have read
6 this Consent Order in its entirety and fully understand and agree to all of the same.

7 **S. Counterparts.** This Consent Order may be executed in any number of counterparts,
8 including by facsimile or e-mail of a .pdf or similar file, each of which shall be deemed to be an
9 original, but all of which, taken together, shall constitute one and the same Consent Order.

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RESPONDENTS:

12

Dolan Gaddi Lending, Inc.

13

By:

14



CHRISTOPHER E. DOLAN

15

Owner

2.6.25
Date

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CHRISTOPHER E. DOLAN

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Individually

2.6.25
Date

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PETER C. GADDI

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Individually

2.6.25
Date

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DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 10th DAY OF February, 2025.



[Redacted signature]

ALI HIGGS, Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

[Redacted signature]

KENNETH J. SUGIMOTO
Financial Legal Examiner Supervisor

Reviewed by:

[Redacted signature]

DREW STILLMAN
Financial Legal Examiner Supervisor

Approved by:

[Redacted signature]

JAMES R. BRUSSELBACK
Acting Enforcement Chief

1 **STATE OF WASHINGTON**
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**
3 **DIVISION OF CONSUMER SERVICES**

4 IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Consumer Loan Act of Washington by:

5 DOLAN GADDI LENDING, INC.,
NMLS # 918742,

6 CHRISTOPHER E. DOLAN, Owner,
7 NMLS # 270548, and,

8 PETER C. GADDI, Owner,
9 NMLS # 785377,

Respondents.

No. C-23-3637-24-SC01

STATEMENT OF CHARGES and
NOTICE OF INTENT TO ENTER AN
ORDER TO CEASE AND DESIST, REVOKE
LICENSES, PROHIBIT FROM INDUSTRY,
IMPOSE FINE, ORDER RESTITUTION,
COLLECT INVESTIGATION FEE, and
RECOVER COSTS AND EXPENSES

10 **INTRODUCTION**

11 Pursuant to RCW 31.04.093 and RCW 31.04.165, the Director of the Department of Financial
12 Institutions of the State of Washington (Director) is responsible for the administration of chapter
13 31.04 RCW, the Consumer Loan Act (Act). After having conducted an investigation pursuant to
14 RCW 31.04.145, and based upon the facts available as of the date of this Statement of Charges and
15 Notice of Intent to Enter an Order to Cease and Desist, Revoke Licenses, Prohibit from Industry,
16 Impose Fine, Order Restitution, Collect Investigation Fee, and Recover Costs and Expenses
17 (Statement of Charges), the Director, through his designee, Consumer Services Division Director Ali
18 Higgs, institutes this proceeding and finds as follows:

19 **I. FACTUAL ALLEGATIONS**

20 **1.1 Respondents.**

21 **A. Dolan Gaddi Lending, Inc. (Respondent DGL)** was licensed by the Department of
22 Financial Institutions of the State of Washington (Department) to conduct business as a consumer
23 loan company on or about March 5, 2014, and continues to be licensed to date.
24

1 **B. Christopher E. Dolan (Respondent Dolan)** is an owner of Respondent DGL.

2 Respondent Dolan was licensed by the Department to conduct business as a mortgage loan originator
3 on or about March 5, 2014, and continues to be licensed to date.

4 **C. Peter C. Gaddi (Respondent Gaddi)** is an owner of Respondent DGL. Respondent

5 Gaddi was licensed by the Department to conduct business as a mortgage loan originator on or about
6 March 25, 2014, until his license expired on January 1, 2022.

7 **1.2 Report of Examination.** In or around June 2023, the Department conducted a compliance
8 examination of Respondent DGL’s business practices for the period of June 1, 2021, to June 30, 2023
9 (examination period). The Department noted violations of the Act which include those set forth
10 below.

11 **1.3 Failed to Comply with Director’s Authority.** Respondent DGL did not provide a
12 substantial number of documents related to the examination as directed by the Department.
13 Respondent DGL did not provide the Department free access to its books, records, and personnel; and
14 only after the Department repeatedly contacted Respondent DGL was the Department able to obtain
15 certain documents and information.

16 **1.4 Failed to Maintain Surety Bond.** Respondent DGL did not maintain a surety bond for its
17 activity in the state of Washington from on or around January 15, 2015, to on or around September
18 30, 2023.

19 **1.5 Failed to Timely File Reports.** Respondent DGL’s financial condition report for the year
20 2021 was due on March 31, 2022, and it was not received by the Department until on or about June
21 14, 2022. Respondent DGL’s financial condition report for the year 2022 was due on March 31,
22 2023, and it was not received by the Department until on or about April 12, 2023.

23 **1.6 Failed to File Accurate Reports.** Respondent DGL submitted inaccurate residential
24 mortgage loan activity reports to the Department for the second, third, and fourth quarters of 2021;

1 and the first, second, and third quarters of 2022. Respondent DGL submitted inaccurate annual
2 assessment reports to the Department for the years 2021 and 2022.

3 **1.7 Unlicensed Activity.** During the examination period, Respondent DGL engaged in
4 unlicensed activity by operating with a manager of loan processors who was not approved for a
5 mortgage loan originator license.

6 **1.8 Failed to Register Trade Names.** During the examination period, Respondent DGL
7 operated under two trade names not registered with the Department.

8 **1.9 Failed to Provide Required Information in Advertisements.** During the examination
9 period, Respondent DGL or its mortgage loan originators operated at least three webpages that did
10 not contain Respondent DGL’s license number, Respondent DGL’s license name, or the mortgage
11 loan originator’s license number closely following their name.

12 **1.10 Advertised Rates or Fees as the, “Best” or “Lowest.”** During the examination period,
13 Respondent DGL advertised online and in its communications scripts that its loans, loan terms, or
14 loan rates were the, “best” or “lowest.”

15 **1.11 Failed to Provide Complete Loan Applications.** During the examination period,
16 Respondent DGL prepared and presented residential mortgage loan applications to at least 12
17 borrowers that had blanks and were not completed.

18 **1.12 Failed to Timely Provide Accurate Rate Lock Agreements.** During the examination
19 period, Respondent DGL did not provide accurate rate lock agreements within three business days of
20 locking interest rates to at least six borrowers.

21 **1.13 Failed to Maintain Records.** Respondent DGL could not provide to the Department
22 documentation of the amount of compensation it paid to mortgage loan originators for specific
23 transactions within the examination period. Respondent DGL did not maintain email

1 communications and mortgage loan originator compensation records for at least five loan files within
2 the examination period.

3 **1.14 Failed to Implement a Compliant Red Flags Policy.** During the examination period,
4 Respondent DGL implemented a red flags policy that did not contain policies and procedures to
5 identify, detect, and respond to relevant red flags; and did not detail how the policy would be
6 periodically updated.

7 **1.15 Failed to Implement a Compliant Bank Secrecy Act/Anti-Money Laundering**
8 **(BSA/AML) Program.** During the examination period, Respondent DGL did not develop and
9 implement a compliant BSA/AML program by not following the independent testing schedule set
10 forth in its program.

11 **1.16 Failed to Implement Compliant Mortgage Loan Originator Compensation Agreements.**
12 During the examination period, Respondent DGL did not develop and implement compliant mortgage
13 loan originator compensation agreements by implementing agreements which based payments on the
14 terms of loan transactions.

15 **1.17 Failed to Adhere to Loan Tolerance Limits.** During the examination period, Respondent
16 DGL provided to a borrower, B.S., an initial loan estimate that disclosed a lower appraisal fee than
17 was charged to the borrower, and the increase in the appraisal fee was higher than the zero percent
18 tolerance limit for such a fee.

19 **1.18 On-Going Investigation.** The Department's investigation into the alleged violations of the
20 Act by Respondents continues to date.

21 **II. GROUNDS FOR ENTRY OF ORDER**

22 **2.1 Prohibited Acts or Practices.** Based on the Factual Allegations set forth in Section I above,
23 Respondents are in apparent violation of RCW 31.04.027(1)(a), (b), (f), (g), (h), and (m) for: directly
24 or indirectly employing any scheme, device, or artifice to defraud or mislead any person; directly or

1 indirectly engaging in any unfair or deceptive practice toward any person; failing to make any
2 disclosures to loan applicants as required by RCW 31.04.102 and any other applicable state or federal
3 law; making, in any manner, any false or deceptive statement or representation with regard to the
4 rates, points, or other financing terms or conditions for a residential mortgage loan; negligently
5 making any false statement or knowingly and willfully making any omission of material fact in
6 connection with any reports filed with the Department; and violating any applicable state or federal
7 law relating to the activities governed by the Act.

8 **2.2 Requirement to Comply with the Director's Authority.** Based on the factual allegations
9 set forth in Section I above, Respondents are in apparent violation of RCW 31.04.145 for failing to
10 comply with the Director's authority.

11 **2.3 Requirement to Maintain Surety Bond.** Based on the factual allegations set forth in Section
12 I above, Respondents are in apparent violation of RCW 31.04.045(4) for failing to maintain a surety
13 bond as required by the Act.

14 **2.4 Requirement to Report.** Based on the factual allegations set forth in Section I above,
15 Respondents are in apparent violation of RCW 31.04.277 for failing to timely submit accurate reports
16 to the Department in a form and containing the information prescribed by the Director.

17 **2.5 Unlicensed Activity.** Based on the Factual Allegations set forth in Section I above,
18 Respondents are in apparent violation of RCW 31.04.035 for engaging in the business of a consumer
19 loan company and employing individuals not licensed by the Department to assist borrowers in
20 applying for residential mortgage loans.

21 **2.6 False, Misleading, or Deceptive Advertisements.** Based on the Factual Allegations set forth
22 in Section I above, Respondents are in apparent violation of RCW 31.04.135 for advertising or
23 permitting to be advertised, in any manner whatsoever, any statement or representation with regard to
24 the rates, terms, or conditions for the lending of money that is false, misleading, or deceptive.

1 **2.7 Requirement to Maintain Records.** Based on the Factual Allegations set forth in Section I
2 above, Respondents are in apparent violation of RCW 31.04.155 for failing to maintain the books,
3 accounts, records, papers, documents, files, and other information relevant to a loan for a minimum
4 of three years, or the period of time required by federal law, whichever is longer, after making the
5 final entry on that loan.

6 **III. AUTHORITY TO IMPOSE SANCTIONS**

7 **3.1 Authority to Order to Cease and Desist.** Pursuant to RCW 31.04.093(5)(a), the Director
8 may issue an order directing the licensee, its employee or loan originator, or other person subject to
9 the Act to cease and desist from conducting business in a manner that is injurious to the public or
10 violates any provision of the Act.

11 **3.2 Authority to Revoke License.** Pursuant to RCW 31.04.093(3)(b), the Director may revoke a
12 license for violation of any provision of the Act.

13 **3.3 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6)(e), the Director
14 may issue an order prohibiting from participation in the affairs of any licensee, any officer, principal,
15 employee, mortgage loan originator, or any other person subject to the Act for a violation of RCW
16 31.04.027, RCW 31.04.102, RCW 31.04.155, or RCW 31.04.221.

17 **3.4 Authority to Impose Fine.** Pursuant to RCW 31.04.093(4)(a), the Director may impose fines
18 of up to one hundred dollars per day, per violation, upon the licensee, its employee or loan originator,
19 or any other person subject to the Act for any violation of the Act.

20 **3.5 Authority to Order Restitution.** Pursuant to RCW 31.04.093(5)(c), the Director may issue
21 an order directing the licensee, its employee or loan originator, or other person subject to the Act to
22 make a refund or restitution to a borrower or other person who is damaged as a result of a violation of
23 the Act.

1 **3.6 Authority to Charge Investigation Fee.** Pursuant to RCW 31.04.145(3), WAC 208-620-
2 590, and WAC 208-620-610(7), every licensee examined or investigated by the Director or the
3 Director’s designee shall pay for the cost of the examination or investigation, calculated at the rate of
4 \$69.01 per staff hour devoted to the examination or investigation, and shall pay travel costs if the
5 licensee maintains its records outside the state.

6 **3.7 Authority to Recover Costs and Expenses.** Pursuant to RCW 31.04.205(2), the Director
7 may recover the state’s costs and expenses for prosecuting violations of the Act.

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1 **IV. NOTICE OF INTENT TO ENTER ORDER**

2 Respondents' violations of the provisions of chapter 31.04 RCW and chapter 208-620 WAC,
3 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose
4 Sanctions, constitute a basis for the entry of an Order under RCW 31.04.093, RCW 31.04.165, RCW
5 31.04.202, and RCW 31.04.205. Therefore, it is the Director's intent to ORDER that:

6 **4.1** Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi
7 cease and desist from conducting business in a manner that is injurious to the public or
8 violates any provision of the Act, including those violations identified in this
9 Statement of Charges.

10 **4.2** Respondent Dolan Gaddi Lending, Inc.'s license to conduct the business of a
11 consumer loan company be revoked.

12 **4.3** Respondent Christopher E. Dolan's license to conduct the business of a mortgage loan
13 originator be revoked.

14 **4.4** Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi be
15 prohibited from participation in the conduct of the affairs of any consumer loan
16 company subject to licensure by the Director, in any manner, for a period of five
17 years.

18 **4.5** Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi
19 jointly and severally pay a fine. As of the date of this Statement of Charges, the fine
20 totals \$80,000.

21 **4.6** Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi
22 jointly and severally pay restitution to the borrower referenced in Section 1.17. As of
23 the date of this Statement of Charges, the restitution totals \$129.

24 **4.7** Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi
jointly and severally pay an investigation fee. As of the date of this Statement of
Charges, the investigation fee totals \$5,000.

4.8 Respondents Dolan Gaddi Lending, Inc., Christopher E. Dolan, and Peter C. Gaddi
jointly and severally pay the Department's costs and expenses for prosecuting
violations of the Act in an amount to be determined at hearing or by declaration with
supporting documentation in event of default by Respondents.

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1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges is entered pursuant to the provisions of RCW 31.04.093, RCW
3 31.04.165, RCW 31.04.202, and RCW 31.04.205, and is subject to the provisions of chapter 34.05
4 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as
5 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING
6 accompanying this Statement of Charges.

7 Dated this 18th day of September, 2024.


8 
9 ALI HIGGS, Director
10 Division of Consumer Services
11 Department of Financial Institutions

12 Presented by:

13 
14 KENNETH J. SUGIMOTO
15 Financial Legal Examiner Supervisor



16 Reviewed by:

17 
18 DREW STILLMAN
19 Financial Legal Examiner Supervisor

20 Approved by:

21 
22 JAMES R. BRUSSELBACK
23 Acting Enforcement Chief